

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

BRIAN PERRY,

Plaintiff,

v.

ADIDAS AMERICA, INC.,

Defendant.

Civil Action No. 2:23-cv-00959-CCW

Honorable Christy Criswell Wiegand

**MOTION FOR ADMISSION PRO HAC VICE OF STANTON R. GALLEGOS**

Stanton R. Gallegos, undersigned counsel for Defendant adidas America, Inc., hereby moves that Stanton R. Gallegos be admitted to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Defendant adidas America, Inc. in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Declaration for Admission Pro Hac Vice of Stanton R. Gallegos filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

DATED: September 21, 2023.

Respectfully submitted,  
MARKOWITZ HERBOLD PC

*s/ Stanton R. Gallegos*

Stanton R. Gallegos, OR #160091  
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1455 SW Broadway, Suite 1900  
Portland, OR 97201  
(503) 295-3085  
*Counsel for Defendant adidas America, Inc.*

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**DECLARATION OF STANTON R. GALLEGOS IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC VICE**

I, Stanton R. Gallegos, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I, Stanton R. Gallegos, make this declaration in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Defendant adidas America, Inc. in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

2. I am a Shareholder of the law firm Markowitz Herbold PC.

3. My business address is 1455 SW Broadway, Suite 1900, Portland, OR 97201.

4. I am a member in good standing of the bars of Oregon, New York, and Washington, as well as the bars of the District of Oregon, Southern District of New York, Eastern District of New York, Northern District of New York, Western District of Washington,

Central District of Illinois, U.S. Court of Appeals for the Second Circuit, and U.S. Court of Appeals for the Ninth Circuit.

5. My bar identification numbers are Oregon, #160091; New York, #5121348; and Washington, #53430.

6. A current certificate of good standing from the Oregon State Bar is attached to this Declaration as Exhibit 1.

7. I have no disciplinary actions.

8. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

9. I attest that I have read, know and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

10. Based upon the foregoing, I respectfully request that I be granted pro hac vice admission in this matter.

DATED: September 21, 2023.

s/ Stanton R. Gallegos  
Stanton R. Gallegos

**CERTIFICATE OF SERVICE**

I, Stanton R. Gallegos, an attorney, do hereby certify that on September 21, 2023, I electronically submitted the foregoing MOTION FOR ADMISSION PRO HAC VICE OF STANTON R. GALLEGOS AND DECLARATION OF STANTON R. GALLEGOS IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE to the Clerk of the Court for the United States District Court for the Western District of Pennsylvania, using the electronic case files system of the Court. The electronic case files system sent a “Notice of Electronic Filing” to all counsel of record, who, by rule, have consented to accept the Notice as service of this document by electronic means.

s/ Stanton R. Gallegos  
Stanton R. Gallegos

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## Certificate of Good Standing

State of Oregon                    )  
  ) ss.  
County of Washington        )

I, Troy Wood, do hereby certify that I am Regulatory Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

**STANTON R GALLEGOS, BAR NO. 160091**

was admitted to practice law in the State of Oregon by Examination and became an active member of the Oregon State Bar on January 8, 2016.

There are no grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Mr. Gallegos is an Active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 20<sup>th</sup> day of September, 2023.



Troy Wood  
Regulatory Counsel  
Oregon State Bar

\*This certificate expires 60 days from the date of issuance\*